

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI

Joseph Bradley Garrison
(full name) (Register No.)

18-5051-CV-SW-SRB-P
Case No.

Plaintiff(s).

v.

Vernon County Jail
(Full name)
Vernon Co. Mo.

Defendant(s).

Defendants are sued in their (check one):

Individual Capacity

Official Capacity

Both

COMPLAINT UNDER THE CIVIL RIGHTS ACT OF 42 U.S.C. § 1983

I. Place of present confinement of plaintiff(s): Lawrence Co Jail, Mt. Vernon
MO. 65712

II. Parties to this civil action:

Please give your commitment name and any another name(s) you have used while incarcerated.

A. Plaintiff Joseph Bradley Garrison Register No. _____
Address 1716 East 8th St, Springfield, MO 65802
IN Care of: Sarah Jones

B. Defendant Vernon County Jail
any and all persons and law enforcement responsible
Is employed as _____

For additional plaintiffs or defendants, provide above information in same format on a separate page.

III. Do your claims involve medical treatment? Yes No

IV. Do you request a jury trial? Yes No

V. Do you request money damages? Yes No

State the amount claimed?

\$15,000 ~~110,000~~ actual/punitive)

VI. Are the wrongs alleged in your complaint continuing to occur? Yes No

VII. Grievance procedures:

A. Does your institution have an administrative or grievance procedure?

Yes No

B. Have the claims in this case been presented through an administrative or grievance procedure within the institution?

Yes No

C. If a grievance was filed, state the date your claims were presented, how they were presented, and the result of that procedure. (Attach a copy of the final result.)

*E-Filed on Kiosk in Vernon County Jail
Tues May 15 2018 First grievance and every Day
I Filed a grievance For 9 days while there
Never received results or answers written or Verbal.*

D. If you have not filed a grievance, state the reasons.

VIII. Previous civil actions:

A. Have you begun other cases in state or federal courts dealing with the same facts involved in this case?

Yes No

B. Have you begun other cases in state or federal courts relating to the conditions of or treatment while incarcerated?

Yes No

C. If your answer is "Yes," to either of the above questions, provide the following information for each case.

(1) Style: _____

(Plaintiff)

(Defendant)

(2) Date filed: _____

(3) Court where filed: _____

(4) Case Number and citation: _____

(5) Basic claim made: _____

(6) Date of disposition: _____

(7) Disposition: _____
(Pending) (on appeal) (resolved)

(8) If resolved, state whether for: _____
(Plaintiff or Defendant)

For additional cases, provide the above information in the same format on a separate page.

IX. Statement of claim:

A. State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates and places. Describe specifically the injuries incurred. Do not give legal arguments or cite cases or statutes. You may do that in Item "B" below. If you allege related claims, number and set forth each claim in a separate paragraph. Use as much space as you need to state the facts. Attach extra sheets, if necessary. Unrelated separate claims should be raised in a separate civil action.

See attached (w/pendages)

Facts of claim to be facts and
true to the best of my recollection
I am mentally disabled and this has been extremely
difficult for me and is only getting worse due
to Negligence of Vernon County. I am
mentally disabled since July 2011

B. State briefly your legal theory or cite appropriate authority:

Medical Negligence while in jail
in Vernon County jail there is no way possible
that my humiliation and degradation and possible
could I still lose my fingers due to not having
my meds. Because I have mental health issues
not received any of my meds for either and
have to have someone else write this down for
me because it bothers me so much and I am afraid
about repercussions from the County of Vernon, MO for this
but I don't want others to have to go through this
Torture and pain and suffering.

Last 30 days since Incarceration May 02-18

Joseph Bradley Garrison

1-24-78 / 55#491800448
Fed# 14976045 | Prison ^{state} ID# 523604

1716 E. 8th St, Springfield, MO 65802
417-430-6547

Wed May 02-2018

Green Co. Jail - Cox North Springfield MO
From there on Day I was Arrested, For my
Infected and Broken Index Finger on my Left
Hand. Taken By Transport officers for Green County
Mo. (Springfield) to the Emergency Room

(See Medical Report From North Cox Hospital)

See pg A-1 seen a Nurse IN Passing and she said A-3 ^{may}

Wed May 9, 2018 9:15 am May 8 Sleep A-2

Upon Being Relieved from transport to Vernon
Co Mo. Jail (2040 E. Hunter St. Nevada Mo 64772)
From Green Co Via Green County transport officer
into Vernon County custody.

I was placed in H#6 Holding Cell and Did
not See medical until May 13, 2018.

4 days I slept on a Mattress that was Soiled
with Human feces under Blankets that were
Soiled From prior occupants. It Stank, was
Unsanitary, for 4 days I plead to every E.O. and
Police officers that would listen to me every
^{inhumane} 30 mins, I was denied Medical attention

For 4 days, left in very Nasty unsanitary
Conditions with a constant flow of INTake
of INMATES (continued on next page)

CO. KENNY WARDEN UNIT WARDEN,

May 13 2018 1 pm

May 17 2018 Finally got to See A Nurse at this point
I took pictures of my Finger Saying I would probably lose my finger
~~that is why they took multiples of pictures~~

at this Jail, By the Second Day of
Not Having My Meds a Fever Set in
Cold Sweats, Extreme pain and Hallucinations

My Finger Swelled to twice the size
it was the previous day for 4 days Constantly
worse Each day ^{constant small area of dead infection} No Matter how much I please
and even cried from the pain Humiliated
and Laughter at By Custody, Kept in a
Cell with No means to Contact Someone
Never Seeing Medical and Forcibly By this
facility, No towels, No Soap, No toothbrush
Constant Sweats from the persistent pain
and throbbing Brought on By Four days of
Negligence Denied IRR's and Grievances
everyday for those 4 days before the
Weekend Night Shift Commander C.O. Kenny
moved myself and Mr. Depau to the gym with
26 other Inmates On Mothersday (May 13, 2018)

2 of the Inmates close had large Sores and blisters From
Staph INFECTION of oozing green INFECTION.

Put IN medical Requests 3 Daily (E-Filed) May 15th
My PIN# Finally Started working so I could File
medical requests and IRR and grievances daily.

First Seen Nurse on May 17, 2018 given Bactrim
and She took pictures. Did Not see the Nurse or
any Medical Care Physician until they transported me
on May 24th 2018 to Lander Co. Jail

Appendages

Appendage / A-1

Medical Observations and professional care
Physician of ER in North Cox Medical Facility
Said:

X Rayed It, 2 shots of antibiotics one
in Each Hip, Was prescribed pain meds
and Antibiotics (See Medical charts and discharge
papers with specific Instructions)
S.I. transport officer was Instructions
in writing and Verbally told By care
Physicians) to See a finger/hand
specialist that there were chips and/or
multiple breaks that could be seen in X-Ray

A-2 From May 2-8th 2018 while in Greene Co
Jail with proper medical care daily and sanitary
environment. The Nurse would Redress
and Pack my Finger (Left Hand Index Finger)
2 X a day and Received meds.

A-3 May 9th 2018 Received to Vernon
County Jail. 11:12pm after Seeing Judge for
Video Court that I and Inmate DePaul
where first to see Judge (documented in
video court) when officers physically took
down to the ground a Inmate that was
Naked, At this point Myself and DePaul
were the only 2 done with video court
in the same area as this Incident occurred

contined from front Pg A-3

May 9th 2018

We Depaw and I where placed in the Bull pen and Seen the Nurse and/or Medical Specialist Pass By and Stepped her to Show her my finger that it Had to Be packed 2 X's a day, The Nurse or medical Woman Said: She Said She did Not Have time For it and Would Be Back; She never did return and I didn't See her Again the rest of the time (was in Vernon County Jail)

Signed X Joseph Garrison

Signed this Fourth day of June, 2018

are facts and true to the best of
my ability and recollection

Helped with paper work and writing By
Bill Filbeck JR

Billy Filbeck Jr.

Signed

June 4th 2018

X. Relief: State briefly exactly what you want the court to do for you. Make no legal arguments.
*to award me pain, suffering, Punitive
Damages along with further medical expenses
and pain suffering for past, present and future also
lawyers fees and filing. So The County will never*
XI. Counsel: *Counsel: do this to anyone again.*

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name. Bill Filbeck JR, #1016945 P.O. 256, Lampe Mo. 65681

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action? Yes No ✓

If your answer is "Yes," state the name(s) and address(es) of each lawyer contacted.

C. Have you previously had a lawyer representing you in a civil action in this court?

Yes No ✓

If your answer is "Yes," state the name and address of the lawyer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed (signed) this Fourth day of June, 2018

Joseph A. Zimmerman
Signature(s) of Plaintiff(s)

Joseph Garrison
380 E Water St
Mt. Vernon MO

65712

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